



P.O. Box 122
Eola, IL 60519
630/585-7530
FAX 630/585-7593
www.cdrecycling.org

January 14, 2012

John Therriault
Ill. Pollution Control Board
100 W. Randolph Ste 11-500
Chicago, IL 60601

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STATE OF ILLINOIS
Pollution Control Board

R12-9
PCH 21

Dear IPCB

The recycling of construction and demolition (C&D) materials is an important environmentally beneficial activity throughout the world. The recovery of the materials we put in our buildings and roads saves on using the earth's resources because the end products made from C&D recycling replaces virgin materials, saving them for future generations. The environmentally friendly business provides green jobs and taxes while saving on landfill space so our entire countryside does not become either an open pit or a former landfill, which can have run off and emission problems, such as hydrogen sulfide gas or methane.

Indeed, the concept that C&D materials are loaded with contaminants and recycling those materials will release those toxins into the local area is preposterous, or we seriously need to consider moving out of our current homes and business structures. That is where the material is coming from. For example, the claim that asbestos is in shingles is a straw man because our data shows that less than 1% of all post consumer shingles contain asbestos, and they contain asbestos at less than 1%, which is the EPA guideline for safety. And as asbestos has not been used in shingles since the early 1970s, virtually all those shingles are already out of the stream.

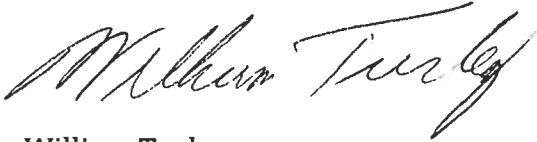
As for other asbestos in buildings, by federal law (NESHAP) the asbestos is required to be removed and disposed of properly by the generator, usually the demolition contractor, before disposal anywhere, including in a landfill.

We would like to remind the board that silica is sand, and that if asphalt is so dangerous, then why is it the ubiquitous road material it is if it is so hazardous?

Finally, PCBs in buildings are so rare and is limited to when a manufacturing operation or similar handled them. State and federal regulations already require the careful handling of PCBs and they are not allowed in any C&D recycling facility, including those in downstate Illinois. It is high time that a C&D recycling facility began operating outside of the Chicago area in order to provide downstate the same environmental benefits enjoyed in northern Illinois.

The Construction Materials Recycling Association is a nonprofit organization that promotes the recycling of C&D materials, and is considered by virtually everyone the leading experts on the subject. Also, I grew up in downstate Illinois, and would take a personal interest in answering any questions you and others might have on C&D recycling. Please feel free to contact me if you have any questions or comments.

Sincerely,

A handwritten signature in black ink that reads "William Turley". The signature is written in a cursive, flowing style.

William Turley
Executive Director, Construction Materials Recycling Association
Executive Director, CMRA Issues & Education Fund
Associate Publisher & Editor, C&D World
630/585-7530
turley@cdrecycling.org
www.cdrecycling.org
www.shinglerecycling.org
www.drywallrecycling.org
www.concreterecycling.org
www.asphaltpavementrecycling.org